

## REMARKS

This application has been reviewed in light of the Office Action dated February 6, 2006. Claims 1-14 are presented for examination, of which Claims 1, 7, and 13 are in independent form. Claims 1-14 have been amended to define still more clearly what Applicant regards as his invention; it should be noted that the claim amendments are neither intended nor believed to narrow the scope of any claim recitation. In particular, the independent claims have been reworded to clarify the relationship between the received object and the groups. Support for these amendments may be found in step 522 of method 500, which is described on page 12 of the specification.<sup>1</sup> Also, dependent Claims 3 and 9 have been amended to clarify that it is the data describing the received object that is passed to the detection schemes and proper antecedence.

Favorable reconsideration is requested.

In the outstanding Office Action, Claims 1-14 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 4,737,980 (Curtin et al.).

One aspect of the present invention, set out in independent Claim 1, is a method of forming object groups from received objects. For each received object the method performs a number of steps. The method starts by passing data describing the received object to at least one detection scheme. Each detection scheme has an associated object group type, and detects whether the received object forms part of an object group of the associated object group type. Each detection scheme also has a priority.

---

<sup>1/</sup> The claim scope of course is not limited by the details of this or any other particular embodiment that may be referred to.

In response to passing the data to the at least one detection scheme, the method receives notification of whether the received object forms part of the object groups of the respective detection schemes. The method then determines whether one or more of the object groups are completely formed upon inclusion of the received object in the one or more object groups. Partly formed object groups form a list. A completely formed object group is output for rendering based on the priorities.

Applicant respectfully disagrees with the Examiner's interpretation of *Curtin* and submits Claim 1 and the other claims are in condition for allowance for reasons set out in detail in the following. *Curtin* relates to a method and apparatus for entering data into a computer using an abbreviated keyboard. In an abbreviated keyboard each key of the keyboard represents a plurality of characters. The computer, upon receipt of a signal resulting from a depression of a key, generates a best guess of which one of the plurality of characters associated with the depressed key is desired by the user to be ultimately entered into the computer. A display indicates the guess. The user may accept the guess, if correct, or press further keys until the correct character is displayed. (Familiarity with keyboards of that general type is of course now widespread with the use of cell phone ten-key pads for text messaging, etc.)

The Examiner equates the character being inputted in *Curtin* with the object referred to in Applicant's Claim 1. The Examiner asserts on page 2 of the Office Action that the best guess character is inherently the character of highest priority. Applicant points out, however, in Claim 1 (and Applicant's other claims) it is the detection schemes that have priorities, and not the objects.

Further, the Examiner equates the four alphanumeric characters represented by a key disclosed in *Curtin* with the object group type referred to Applicant's claims. Page 2 of the Office Action asserts that it is inherent that the computer detects whether a received character forms part of an object group of the associated object group type, or group of four alphanumeric characters. The Examiner continues by asserting that the computer receives a notification whether the received character (the object, in his interpretation of *Curtin*) forms part of the object group. In *Curtin* any character can *only* belong to a single group of four alphanumeric characters. By contrast, in Applicant's claims, an object may form part of the object group of one *or more* of the detection schemes.

Yet further, the Office Action completely ignores the recitation of "determining whether one or more of the object group are completely formed". Even assuming for argument's sake that the characters that are inputted in *Curtin* could be taken as corresponding to the objects referred to in Applicant's claims, there is no disclosure in *Curtin* of completely forming character string, or any other string or group of characters, upon inclusion of the received character in one or more object groups. *Each* character is *individually* formed and output.

In *Curtin*, it is the user who determines whether the character displayed is the intended character. The computer merely selects from the predefined group of four alphanumeric characters a most likely character intended by the user. The user may depress a key in order for another character to be selected, until the intended character is displayed. The user then accepts that character by depressing another key. Therefore, in *Curtin* it is the user, not the computer, who forms a character string, using the computer and abbreviated keyboard.

The computer merely provides one of the four alphanumeric characters in an alternative order based upon a best guess. The only detection performed in *Curtin* is determining which key has been pressed and determining which of the four possible characters is displayed to the user as the best guess.

In view of the foregoing, it is submitted that *Curtin* does not disclose the steps recited in Claim 1. At the very least, nothing in *Curtin* has been shown to correspond to the passing step, at least in part because nothing in that patent corresponds to the recited detection scheme that is “operative to detect whether that received object forms part of an object group of the associated object group type”, as recited in Claim 1, since in the *Curtin* system, every character that is inputted belongs to a single, predefined group of four. Also, since that patent has nothing to correspond to the detection schemes, it also does not have the recited receiving step, since that step involves receiving a notification from such a detection scheme. Again, nothing in that patent meets the recited determining step, since as noted the groups of four characters in the *Curtin* system are predefined, and the system does not make any determination about whether the inputting of a character by the user makes a group complete (nor is it understood what that would even mean in the context of the *Curtin* system). Again, the inputted character is simply displayed in the *Curtin* system, and then is either accepted or passed over by the user; this does not await the “completion” of any object group. Thus, Applicant cannot agree that *Curtin* actually discloses or suggests any of the steps recited in Claim 1, and deems that claim to be allowable over that patent.

Independent Claims 7 and 13 are, respectively, a system and a program-product claim corresponding to method Claim 1, and are both believed to be allowable over *Curtin* for at least the same reasons as set out above with regard to Claim 1.

A review of the other art of record has failed to reveal anything which, in Applicant's opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

s/Leonard P Diana/  
Leonard P. Diana  
Attorney for Applicant  
Registration No. 29,296

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3801  
Facsimile: (212) 218-2200

NY\_MAIN 567293v1